

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**TRIVEL, INC.**

**Plaintiff,**

**Civil Action No. 2-25-cv-10190-SKD-CIv.  
Hon. Susan K. DeClerq**

**Tech Smart USA, Inc., et al.**

**Defendants.**

**STIPULATION AND CONSENT MOTION TO REFER THIS CASE TO A  
MAGISTRATE JUDGE FOR A SETTLEMENT CONFERENCE OR  
MEDIATION**

NOW COME the parties, through counsel, and hereby stipulate and jointly move that this Court refer this matter to a U.S. Magistrate Judge (other than one who may hear discovery or other matters arising in this case) for a settlement conference pursuant to L.R. 16.6 or mediation pursuant to L.R. 16.4. The parties believe that such a process will facilitate settlement of this case and avoid the cost of further litigation.

Dated: April 9, 2025

Respectfully submitted,

/s/ Daniel M. Press

Daniel M. Press, Va. Bar No. 37123  
dpress@chung-press.com  
Chung & Press, P.C.  
6718 Whittier Avenue/Suite 200  
McLean, VA 22101  
703-734-3800  
703-734-0590 (fax)

/s/ Kurt O'Keefe

Kurt O'Keefe P30718

Local Counsel for Plaintiff

1254 Woodbridge Street

St. Clair Shores MI 48080

313-962-4630

[koklaw@gmail.com](mailto:koklaw@gmail.com)

Counsel for Plaintiff

/s/ Marc Sackin

Marc Sackin

MORGAN STARR SACKIN, PLLC

Attorneys for Defendants

208 W. Park Street

Lapeer, MI 48446

(810) 664-9908

Email: [msackin@starrsackin.com](mailto:msackin@starrsackin.com)

Counsel for Defendants